

REMARKS

The present application includes pending claims 1-41, all of which have been rejected. By this Amendment, claims 1, 12, 26, 34 and 36. The Applicants respectfully submit that the pending claims define patentable subject matter.

Claims 1-24 and 26-41 stand rejected under 35 U.S.C. 102(e) as being anticipated by United States Patent No. 7,065,778 ("Lu"). Claim 25 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Lu in view of United States Patent No. 6,477,708 ("Sawa"). The Applicants respectfully traverse these rejections for at least the reasons previously discussed during prosecution and the following.

I. Lu Does Not Anticipate Claims 1-11

Lu "relates to the field of utilizing personalized video recorders and other similar types of devices to distribute television programming." *See* Lu at column 1, lines 7-11. In particular, Lu discloses a system in which a user is able to record a show that is transmitted in another broadcast area. *See id.* at Abstract.

For example, Lu describes the following:

Specifically, personalized video recorder 200 is coupled to the Internet 302 such that it can receive an electronic programming guide (EPG) containing worldwide television programming from an EPG server computer 304. The user of personalized video recorder 200 utilizes the EPG to request delivery of a specific television show that may not be available to him or her. Upon reception of the request from personalized video recorder 200, EPG server computer 304 locates via Internet 302 one or more personalized video recorders... situated within a broadcast region of the requested television show. Subsequently, EPG server computer 304 programs one or more personalized video recorders... to record the requested television show when it is broadcast by a television content provider.... Once the

personalized video recorders... record the television show, one or more of the personalized video recorders may transmit it to EPG server computer 304 which then transmits it to the requested personalized video recorder 200. In this manner, the present embodiment enables personalized video recorder 200 to order and receive specific television shows that are unavailable from its television content provider....

Lu at column 6, lines 39-61. Thus, Lu discloses a system in which a user sends a recording request that is received by a server computer via the Internet. The server computer then arbitrarily locates a recorder within the broadcast region of the show, and then sends the recorded show back to the requesting user.

A. A User Interface Supporting The Selection And Scheduling Of Media Delivery To A Second Location

Lu does not describe, teach, or suggest a “user interface supporting the selection and scheduling of media delivery to a **second location**,” as recited in claim 1. The Office Action cites Lu at column 6, lines 43-45 and 50-54 as disclosing these limitations. These portions of Lu recite, however, the following:

The user of personalized video recorder 200 utilizes the EPG [electronic programming guide] to request delivery of a specific television show that may not be available to him or her.

* * *

Subsequently, EPG server computer 304 programs one or more personalized video recorders (e.g., 200A and/or 200B) to record the requested television show when it is broadcast by a television content provider (e.g., television head-end 308).

Lu at column 6, lines 43-54. Thus, in Lu, the user requests delivery for a television show at his/her location through the EPG. The EPG then arbitrarily locates a PVR in another area to record the show. After the show is recorded, the show is sent to the user at his/her location.

That is, in Lu, selection and delivery of the show occurs at a single location. This passage of Lu does not describe, teach, or suggest, however, a “user interface supporting the selection and scheduling of media delivery to a **second location**,” as recited in claim 1. Thus, for at least this reason, the Office Action has not established a prima facie case of anticipation with respect to claims 1-11.

The Office Action responds to the Applicants as follows:

[The Applicants argue that] Lu does not teach “a user interface supporting the selection and scheduling of media delivery to a second location.... This is not found persuasive because Lu teaches a system that a user can use a electronic programming guide (EPG) on his PVR to retrieve media from remote PVR, the EPF is the user interface that allows user to select and schedule media delivery from PVR 200A to PVR 200. **(Col 6 lines 43-45,** user of PVR 200s uses EPG to select and retrieve specific media content.

See May 29, 2007 Office Action at page 2 (emphasis added).

Claim 1 recites a “user interface supporting the selection and scheduling of media delivery to a **second location**.” In Lu, however, the user **selects** media from his/her home, and the media is then eventually delivered to that home. Thus, the selection and delivery of the media occurs at a single location.

As noted above, the Office Action cites Lu at column 6, lines 43-45 as disclosing the relevant claim limitations. This portion of Lu recites, however, the following:

The user of personalized video recorder 200 utilizes the EPG to request delivery of a specific television show that may not be available to him or her.

Clearly, the user is not traveling from his/her home to the location of the EPG to request delivery. Instead, the user requests delivery from his/her home. That request is then sent to the

EPG, which then arbitrarily locates a PVR in the broadcast area of the show. The recorded show is then sent back to the user at his/her home. Again, the request/selection of a television show is performed at the user's home (i.e., a first location). The show is then delivered to the user's home (i.e., the first location). Lu does not describe, teach or suggest, however, a "user interface supporting the **selection and scheduling of media delivery to a second location,**" Thus, for at least these reasons, the Lu does not anticipate claims 1-11.

B. Receiving A Request Identifying One Of The First And Second Associated Network Addresses, And Responding By Identifying The Other Of The Associated First And Second Network Addresses

Claim 1 also recites, in part, "server software that maintains a user defined association of the first and second network addresses, that receives a request identifying one of the first and second associated network addresses, and that responds by identifying the other of the associated first and second network addresses to support delivery" Lu does not describe, teach, or suggest such limitations. Instead, Lu merely discloses that a user of a PVR requests delivery of a specific television show, at which point a server computer arbitrarily locates another PVR in a particular broadcast area to record the show for the requesting PVR.

The Office Action cites Lu at column 10, lines 10-15 as disclosing a request that "identifies one of the associated first and second network protocol addresses." *See* May 29, 2007 Office Action at page 5 and February 20, 2007 Office Action at page 6. This portion of Lu states, however, the following:

Furthermore, the programming instructions of step 512 may also include an Internet Protocol (IP) address of a device (e.g., personalized video recorder 200) that the personalized video recorder (e.g., 200A or 200B) should transmit the requested television show to once it has been recorded.

Lu at column 10, lines 10-15. This portion of Lu merely indicates the IP address of the location in which the recorded show will be sent. This portion of Lu does not, however, describe, teach or suggest “server software that **maintains a user defined association of the first and second network addresses**, that receives a **request** identifying one of the first and second associated network addresses, and that **responds by identifying the other of the associated first and second network addresses** to support delivery,” as recited in claim 1.

Additionally, the Office Action cites Lu at column 6, lines 45-50 as disclosing “respond[ing to a request that identifies one of the associated first and second network addresses] by identifying the other of the associated first and second network addresses” *See* May 29, 2007 Office Action at page 5 and February 20, 2007 Office Action at page 6. This portion of Lu recites, however, the following:

Upon reception of the request from personalized video recorder 200, EPG server computer **locates via Internet** 302 one or more personalized video recorders (e.g., 200A and/or 200B) situated within a broadcast region of the requested television show.

See Lu at column 6, lines 45-50 (emphasis added). The “request” mentioned in this passage is a “request [for] delivery of a specific television show that may not be available to him or her.” *See id.* at column 6, lines 43-45. In response to the request for delivery, Lu discloses that the EPG server “locates one or more personalized video recorders situated within a broadcast region of the requested television show.” Location of a recorder within a particular broadcast region in response to a request for delivery of a particular television show is not a response to a request that identifies one of the associated first and second network addresses that “identif[ies] the other of the associated first and second network addresses to support delivery,” as recited in claim 1.

The Office Action responds to the Applicants as follows:

[The Applicants argue that] Lu does not teach or suggest “receiving a request identifying one of the network protocol addresses and responding by identifying the other”.... In response to applicant’s argument, Lu teaches PVR 200 sends a request to EPG server 304 to locate PVR 200A and/or PVR 200B (**Col 6 lines 43-50**), and each PVR is associated with an IP addresses so each PVR could communicate with one another (**Col 10 lines 10-12**). In order for PVR to communicate with one another in a networked environment, each device is having a network address. PVR 200 is requesting for content and based on the request from PVR 200, PVR 200A/200B is responding with the requested content. Network addresses of are identified at each device to enable network communication and data transmission.

See May 29, 2007 Office Action at pages 2-3 (emphasis added).

As discussed at length above, Lu simply does not describe, teach, or suggest, however, “server software that **maintains a user defined association of the first and second network addresses**, that receives a **request** identifying one of the first and second associated network addresses, and that **responds by identifying the other of the associated first and second network addresses** to support delivery,” as recited in claim 1. The Office Action cites to column 6, lines 43-50 and column 10, lines 10-12 of Lu as disclosing these limitations. As shown below, however, there is nothing in these cited portions of Lu that describes, teaches or suggests the relevant claim limitations.

First, Lu at column 6, lines 43-50 states the following:

The user of personalized video recorder 200 utilizes the EPG to **request delivery of a specific television show that may not be available to him or her**. Upon reception of the request from personalized video record 200, EPG server computer 304 **locates via Internet 302 one or more personalized video recorders** (e.g., 200A and/or 200B) situated within a broadcast region of the requested television show.

See Lu at column 6, lines 43-50 (emphasis added). Thus, in Lu, a user “requests delivery of a specific television show that may not be available to him or her.” In response to that request for an “unavailable television show,” the EPG server **arbitrarily locates a video recorder in a broadcast region of that television show.**

Claim 1 recites, however, “server software that **maintains a user defined association of the first and second network addresses**, that receives a **request** identifying one of the first and second associated network addresses, and that **responds by identifying the other of the associated first and second network addresses** to support delivery.” Neither the portions of Lu cited in the Office Action, nor the remainder of Lu, describe, teach or suggest such limitations. An EPG server arbitrarily finding a video recorder in a broadcast area of a television show in response to a request for delivery of that show is not an EPG server that “responds by identifying the other of the associated first and second network addresses to support delivery,” as recited in claim 1.

Next, Lu at column 10, lines 10-12 recites the following:

Furthermore, the programming instructions of step 512 may also include an Internet Protocol (IP) address of a device (e.g., personalized video recorder 200) that the personalized video recorder (e.g., 200A or 200B) should transmit the requested television show to once it has been recorded.

This portion of Lu merely discloses that a recorded television show is transmitted to an IP address once it is recorded. Again, however, there simply is nothing in this portion of Lu that describes, teaches or suggests “server software that **maintains a user defined association of the first and second network addresses**, that receives a **request** identifying one of the first and

second associated network addresses, and that **responds by identifying the other of the associated first and second network addresses** to support delivery,” as recited in claim 1.

The Applicants respectfully submit that Lu does not describe, teach or suggest “server software that **maintains a user defined association of the first and second network addresses**, that receives **a request** identifying one of the first and second associated network addresses, and that **responds by identifying the other of the associated first and second network addresses** to support delivery,” as recited in claim 1. Thus, for at least these reasons, Lu does not anticipate claims 1-11.

II. Lu Does Not Anticipate Claims 12-20

The Applicants now turn to claim 12, which recites, in part, “a user interface, at the first location, having at least one view comprising a representation of media available for consumption, the user interface supporting the selection and scheduling of media for delivery at **a second location.**” The Applicants respectfully submit that the Office Action has not established a *prima facie* case of anticipation with respect to claims 12-20, nor does Lu does anticipate claims 12-20, for at least the reasons discussed above in Section I.A.

Additionally, claim 19 recites, in part, “wherein the at least one multimedia display comprises: at least one sensor for detecting a condition, at the first home; and the detection of the condition resulting in a change in the media displayed.” The Office Action cites column 6, lines 8-17 of Lu as disclosing this limitation. See May 29, 2007 Office Action at page 11. However, this portion of Lu states the following:

Additionally, the personalized video recorder 200 of FIG. 2 can include an optional remote control device 216 (e.g., a universal remote control device having a number of buttons, dials, etc.)

which is communicatively coupled to bus 210 for communicating user input information and command selections to the central processor(s) 202. It is appreciated that remote control device 216 may be implemented with the capability to communicate with personalized video recorder 200 utilizing wireless communication (e.g., infrared signaling).

Lu at column 6, lines 8-17. This portion of Lu merely discloses a remote control that may be used with the PVR. Remote controls transmit signals to a device to operate the device, etc. Lu does not disclose that the remote control itself receives any signals or “detects” anything. In short, nothing in this passage describes, teaches or suggests “at least one sensor for detecting a condition, at the first home; and the detection of the condition resulting in a change in the media displayed,” as recited in claim 19. Thus, for at least this additional reason, the Office Action has not established a *prima facie* case of anticipation with respect to claim 19.

III. Lu Does Not Anticipate Claims 21-24

Claim 21 recites, in part, “scheduling media for delivery from a **first location to a second location** based on input from the user at the second location.” The Applicants respectfully submit that the Office Action has not established a *prima facie* case of anticipation with respect to claims 21-24, nor does Lu anticipate these claims for at least the reasons discussed above in Section I.A.

IV. The Proposed Combination Of Lu And Sawa Does Not Render Claim 25 Unpatentable

The Applicants respectfully submit that the proposed combination of Lu and Sawa does not render claim 25 unpatentable for at least the reasons discussed above in Section III.

V. Claims 26-41 Are In Condition For Allowance

The Applicants respectfully submit that claims 26-41 should be in condition for allowance over the cited references for at least the reasons discussed above.

VI. Conclusion

In general, the Office Action makes various statements regarding claims 1-41 and the cited references that are now moot in light of the above. Thus, the Applicants will not address such statements at the present time. The Applicants expressly reserve the right, however, to challenge such statements in the future should the need arise (e.g., if such statement should become relevant by appearing in a future claim rejection).

The Applicants respectfully submit that the Office Action has not established a *prima facie* case of anticipation or obviousness with respect to any of the pending claims for at least the reasons discussed above and request that the outstanding rejections be reconsidered and withdrawn. If the Examiner has any questions or the Applicants can be of any assistance, the Examiner is invited to contact the undersigned attorney for Applicants.

The Commissioner is authorized to charge any necessary fees, or credit any overpayment to the Deposit Account of McAndrews, Held & Malloy, Account No. 13-0017.

Respectfully submitted,

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